



RE: Rico

Duffy, William to: Amelia Piggott, Steven Way, Carol Pokorny,
Matthew Cohn

01/31/2011 04:23 PM

Cc: "Cohen, Adam", Nathan.Block, "Stilwell, Chuck T (bp)"

Amelia - on Atlantic Richfield's behalf, we transmitted a redline AOC proposal to EPA that includes use of a Letter of Credit to satisfy, in part, EPA's financial assurance requirement for the work proposed under the Rico AOC. I have passed your comments onto Atlantic Richfield, and will let you know if my clients' position has changed in light of the call with EPA last week. Without speaking with AR counsel, my understanding is AR continues to support the Rico AOC draft that has been submitted to EPA.

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-----Original Message-----

From: Piggott.Amelia@epamail.epa.gov
[mailto:Piggott.Amelia@epamail.epa.gov]
Sent: Monday, January 31, 2011 1:44 PM
To: Duffy, William
Cc: Way.Steven@epamail.epa.gov; Pokorny.Carol@epamail.epa.gov;
Cohn.Matthew@epamail.epa.gov; Cohen, Adam
Subject: Rico

Dear Bill,

I just wanted to touch base about Rico. It is my understanding that you had a conversation last week with EPA, and Atlantic Richfield expressed the position that it will no longer be entering any Administrative Consent Orders that require liquid financial assurance instruments. Given that, is EPA to assume that Atlantic Richfield no longer wishes to enter into an AOC requiring a liquid financial assurance instrument in Rico? Please let me know.

Thanks,

Amelia

Amelia Piggott
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